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10 Proposed Attorneys for Debtor and Debtor in Possession

8 **UNITED STATES BANKRUPTCY COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **LOS ANGELES DIVISION**

11 In re:

12 CRESTLLOYD, LLC,

13 Debtor and Debtor in Possession.

14 Case No.: 2:21-bk-18205-DS

15 Chapter 11 Case

16 USDC Appeal Case No.: 2:22-CV-02487-MEMF

17 **APPELLANT'S DESIGNATION OF ITEMS TO**  
18 **BE INCLUDED IN THE RECORD ON**  
19 **PROTECTIVE CROSS-APPEAL**

20 Appeal Docket Entry No.: 275

Crestlloyd, LLC, the debtor and debtor in possession in the above referenced bankruptcy case and the appellant in the above referenced cross-appeal (the “Debtor” or “Appellant”), pursuant to Federal Rules of Bankruptcy Procedure Rule 8009(a)(2) and (3), hereby submits the following *Designation Of Items To Be Included In The Record On Protective Cross-Appeal:*

<u>Date Filed</u>	<u>Docket No.</u>	<u>Description</u>
10/26/2021	1 (22 pgs)	Chapter 11 Voluntary Petition Non-Individual. Fee Amount \$1738 Filed by Crestlloyd, LLC List of Equity Security Holders due 11/9/2021. Summary of Assets and Liabilities (Form 106Sum or 206Sum ) due 11/9/2021. Schedule A/B: Property (Form 106A/B or 206A/B) due 11/9/2021. Schedule D: Creditors Who Have Claims Secured by Property (Form 106D or 206D) due 11/9/2021. Schedule E/F: Creditors Who Have Unsecured Claims (Form 106E/F or 206E/F) due 11/9/2021. Schedule G: Executory Contracts and Unexpired Leases (Form 106G or 206G) due 11/9/2021. Schedule H: Your Codebtors (Form 106H or 206H) due 11/9/2021. Statement of Financial Affairs (Form 107 or 207) due 11/9/2021. Corporate Ownership Statement (LBR Form F1007-4) due by 11/9/2021. Statement of Related Cases (LBR Form F1015-2) due 11/9/2021. Disclosure of Compensation of Attorney for Debtor (Form 2030) due 11/9/2021. Incomplete Filings due by 11/9/2021. (Golubchik, David) (Entered: 10/26/2021)
11/18/2021	37 (15 pgs)	Debtor's First Chapter 11 Case Status Report
11/23/2021	52 (95 pgs)	Debtor's Schedules and Statement of Financial Affairs
12/08/2021	66 (177 pgs)	Debtor's Notice Of Motion And Motion For Entry Of Interim And Final Orders: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief; Memorandum Of Points And Authorities And Declaration In Support Thereof
12/10/2021	70 (7 pgs)	Interim Order Granting Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief

1 Date Filed	2 Docket No.	3 Description
12/14/2021	74 (104 pgs)	4 Application Of Debtor And Debtor In Possession To: (1) 5 Employ The Beverly Hills Estates And Compass As Real Estate 6 Brokers Pursuant To 11 U.S.C § 327(a), With Compensation 7 Determined Pursuant To 11 U.S.C. § 328, (2) Employ Concierge 8 Auctions, LLC As Auctioneer Pursuant To 11 U.S.C § 327(a), 9 With Compensation Determined Pursuant To 11 U.S.C. § 328, 10 And (3) Approve The Payment Of Compensation To Real Estate 11 Brokers And Auctioneer From Escrow Upon Closing; 12 Declarations In Support Thereof
12/14/21	75 (11 pgs)	7 Notice of motion/application Notice of Application Of Debtor 8 And Debtor In Possession To: (1) Employ The Beverly Hills 9 Estates And Compass As Real Estate Brokers Pursuant To 11 10 U.S.C § 327(a), With Compensation Determined Pursuant To 11 11 U.S.C. § 328, (2) Employ Concierge Auctions, LLC As 12 Auctioneer Pursuant To 11 U.S.C § 327(a), With Compensation 13 Determined Pursuant To 11 U.S.C. § 328, And (3) Approve The 14 Payment Of Compensation To Real Estate Brokers And 15 Auctioneer From Escrow Upon Closing Filed by Debtor 16 Crestlloyd, LLC (RE: related document(s)74 Application to 17 Employ The Beverly Hills Estates; Compass; and Concierge 18 Auctions, LLC as Real Estate Brokers and Auctioneer 19 Application Of Debtor And Debtor In Possession To: (1) Employ 20 The Beverly Hills Estates And Compass As Real Estate Brokers 21 Pursuant To 11 U.S.C § 327(a), With Compensation Determined 22 Pursuant To 11 U.S.C. § 328, (2) Employ Concierge Auctions, 23 LLC As Auctioneer Pursuant To 11 U.S.C § 327(a), With 24 Compensation Determined Pursuant To 11 U.S.C. § 328, And (3) 25 Approve The Payment Of Compensation To Real Estate Brokers 26 And Auctioneer From Escrow Upon Closing; Declarations In 27 Support Thereof Filed by Debtor Crestlloyd, LLC). (Arnold, 28 Todd) (Entered: 12/14/2021)
12/16/2021	78 (17 pgs)	21 Errata to Application Of Debtor And Debtor In Possession To: 22 (1) Employ The Beverly Hills Estates And Compass As Real 23 Estates Brokers Pursuant To 11 U.S.C § 327(a), With 24 Compensation Determined Pursuant To 11 U.S.C. § 328, (2) 25 Employ Concierge Auctions, LLC As Auctioneer Pursuant To 26 11 U.S.C § 327(a), With Compensation Determined Pursuant To 27 11 U.S.C. § 328, And (3) Approve The Payment Of 28 Compensation To Real Estate Brokers And Auctioneer From Escrow Upon Closing
12/21/2021	81 (6 pgs)	Supplemental Declaration of Lawrence R. Perkins in Support of Application Of Debtor And Debtor In Possession To: (1) Employ The Beverly Hills Estates And Compass As Real Estate Brokers Pursuant To 11 U.S.C § 327(a), With Compensation

<u>Date Filed</u>	<u>Docket No.</u>	<u>Description</u>
		Determined Pursuant To 11 U.S.C. § 328, (2) Employ Concierge Auctions, LLC As Auctioneer Pursuant To 11 U.S.C § 327(a), With Compensation Determined Pursuant To 11 U.S.C. § 328, And (3) Approve The Payment Of Compensation To Real Estate Brokers And Auctioneer From Escrow Upon Closing
12/23/2021	84 (367 pgs)	Motion of Theodore Lanes, Court-Appointed Receiver, and Brutzkus Gubner Rozansky Seror Weber LLP for Entry of Orders Allowing and Directing Immediate Payment of Administrative Expense Claims Pursuant to 11 U.S.C. §§ 543(c), 503(b)(3)(E), and 503(b)(4); Memorandum of Points and Authorities and Declarations of Theodore Lanes and David Seror in Support Thereof
12/29/2021	88 (131 pgs)	Debtor's Notice Of Motion And Motion To: (1) Approve Auction And Bid Procedures Regarding The Sale Of Real Property And (2) Set Scheduling For A Motion To Approve The Sale Of Real Property; Memorandum Of Points And Authorities And Declaration In Support Thereof
01/03/2022	94 (4 pgs)	Objection (related document(s): 66 Motion for Authority to Obtain Credit Under Section 364(b), Rule 4001(c) or (d) Debtor's Notice Of Motion And Motion For Entry Of Interim And Final Orders: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant To Secti filed by Debtor Crestlloyd, LLC) / Limited Objection of Yogi Securities Holdings, LLC to Debtor's Motion for Entry of Interim and Final Orders: (I) Authorizing Debtor to Obtain Senior Secured Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Granting Super-Priority Administrative Claims and Senior Liens, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief Filed by Creditor Yogi Securities Holdings, LLC (Shinderman, Mark) (Entered: 01/03/2022)
1/05/2022	97 (4 pgs)	Limited Objection of Yogi Securities Holdings, LLC to Debtor's Motion to: (1) Approve Auction and Bid Procedures Regarding the Sale of Real Property and (2) Set Scheduling for a Motion to Approve the Sale of Real Property
01/05/2022	98 (5 pgs)	Opposition to Motion to Approve Auction and Bid Procedures Regarding the Sale of Real Property filed by Inferno Investment, Inc.
01/10/2022	104 (2 pgs)	Order Approving Application Of Debtor And Debtor In Possession To: (1) Employ The Beverly Hills Estates And Compass As Real Estate Brokers Pursuant To 11 U.S.C. §327(a), With Compensation Determined Pursuant To 11 U.S.C.

Date Filed	Docket No.	Description
		§328, (2) Employ Concierge Auctions, LLC As Auctioneer Pursuant To 11 U.S.C. §327(a), With Compensation Determined Pursuant To 11 U.S.C. §328, and (3) Approve The Payment Of Compensation To Real Estate Brokers And Auctioneer From Escrow Upon Closing
01/10/2022	105 (2 pgs)	Order Granting Debtor's Motion To: (1) Approve Auction And Bid Procedures Regarding The Sale Of Real Property and (2) Set Scheduling For A Motion To Approve The Sale Of Real Property.
01/12/2022	108 (9 pgs)	Notice Of Filing Proposed "Stipulation" Re: Final Hearing On Debtor's Motion For Entry Of Interim And Final Orders: (I) Authorizing Debtor To Obtain Senior Secured Post-Petition Financing Pursuant To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief Filed by Debtor Crestlloyd, LLC (RE: related document(s)66 Motion for Authority to Obtain Credit Under Section 364(b), Rule 4001(c) or (d) Debtor's Notice Of Motion And Motion For Entry Of Interim And Final Orders: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief; Memorandum Of Points And Authorities And Declaration In Support Thereof Filed by Debtor Crestlloyd, LLC, 88 Motion Debtor's Notice Of Motion And Motion To: (1) Approve Auction And Bid Procedures Regarding The Sale Of Real Property And (2) Set Scheduling For A Motion To Approve The Sale Of Real Property; Memorandum Of Points And Authorities And Declaration In Support Thereof Filed by Debtor Crestlloyd, LLC, 105 Order granting debtor's motion to: (1) approve auction and bid procedures regarding the sale of real property and (2) set scheduling for a motion to approve the sale of real property. (BNC-PDF) (Related Doc # 88) Signed on 1/10/2022). (Golubchik, David) (Entered: 01/12/2022)
01/14/2022	115 (2 pgs)	Order Following Status Conference Amending Certain Dates Under Order Granting Debtor's Motion To: (1) Approve Auction And Bid Procedures Regarding The Sale Of Real Property And (2) Set Scheduling For A Motion To Approve The Sale Of Real Property
01/27/2022	122 (7 pgs)	Final Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And Senior Liens, and (III) Granting Related Relief

<u>Date Filed</u>	<u>Docket No.</u>	<u>Description</u>
02/09/2022	126 (5 pgs)	Order granting motion of Theodore Lanes, court - appointed receiver, and Brutzkus Gubner Rosansky Seror Weber LLP for entry of orders allowing and directing immediate payment of administrative expense claims pursuant to 11 U.S.C. Sections 543(c), 503(B)(3)(e), and 503(b)(4).
02/23/2022	130 (19 pgs)	Debtor's Notice Of Motion And Motion To Extend The Exclusivity Periods For The Debtor To File A Plan And Obtain Acceptance Thereof; Memorandum Of Points And Authorities And Declaration In Support Thereof
03/07/2022	141 (5 Pages)	Stipulation By Crestlloyd, LLC and Stipulation Re: Motion To Sell Property And Hilldun Corporation's Claim In Connection Therewith Filed by Debtor Crestlloyd, LLC (Arnold, Todd) (Entered: 03/07/2022)
03/08/2022	142 (170 pgs)	Debtor's Motion For An Order: (1) Approving The Sale Of The Debtors Real Property Free And Clear Of All Liens, Claims, Encumbrances, And Interests, With The Exception Of Enumerated Exclusions; (2) Finding That The Buyer Is A Good Faith Purchaser; (3) Authorizing And Approving The Payment Of Certain Claims From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period Set Forth In Bankruptcy Rule 6004(h); And (5) Providing Related Relief; Memorandum Of Points And Authorities And Declarations In Support Thereof.
03/09/2022	147 (1 pg)	ORDER APPROVING STIPULATION RE: MOTION TO SELL PROPERTY AND HILLDUN CORPORATIONS CLAIM IN CONNECTION THEREWITH (BNC-PDF) (Related Doc # 141) Signed on 3/9/2022 (Young, Susan) (Entered: 03/09/2022)
03/15/2022	193 (17 pgs; 2 docs)	Objection of Yogi Securities Holdings, LLC to Debtor's Motion to Approve the Sale of Real Property
03/15/2022	194 (6 pgs)	Statement Buyers Statement In Support Of The Sale Of The Property Pursuant To The Bid Procedures And Limited Objection And Reservation Of Rights To The Sale Motion with proof of service Filed by Interested Party Richard Saghian. (Newman, Samuel) (Entered: 03/15/2022)
3/15/2022	195 (5 pgs)	Declaration re: Declaration Of Samuel A. Newman In Support Of Buyers Statement In Support Of The Sale Of The Property Pursuant To The Bid Procedures And Limited Objection And Reservation Of Rights To The Sale Motion with proof of service

1	<b>Date Filed</b>	<b>Docket No.</b>	<b>Description</b>
2			Filed by Interested Party Richard Saghian (RE: related document(s)194 Statement). (Newman, Samuel) (Entered: 03/15/2022)
3	03/15/2022	196 (116 pgs)	Objection Of Nile Niami To Debtor's Motion For An Order: (1) Approving The Sale Of The Debtors Real Property Free And Clear Of All Liens, Claims, Encumbrances, And Interests, With The Exception Of Enumerated Exclusions; (2) Finding That The Buyer Is A Good Faith Purchaser; (3) Authorizing And Approving The Payment Of Certain Claims From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period Set Forth In Bankruptcy Rule 6004(h); and (5) Providing Related Relief; Declaration of Nile Niami in Support Thereof
4	01/06/2022	197	Transcript of Hearing Held January 6, 2022 – Hearing re Debtor's Motion to (1) Approve Auction And Bid Procedures Regarding The Sale Of Real Property and (2) Set Scheduling For A Motion To Approve The Sale Of Real Property
5	3/15/2022	198 (63 Pages)	Opposition to (related document(s): 142 Motion to Sell Property of the Estate Free and Clear of Liens under Section 363(f) Debtor's Motion For An Order: (1) Approving The Sale Of The Debtors Real Property Free And Clear Of All Liens, Claims, Encumbrances, And Interests, With The Exce filed by Debtor Crestlloyd, LLC) Filed by Interested Party Inferno Investment, Inc. (Andrassy, Kyra) (Entered: 03/15/2022)
6	03/15/2022	202 (11 pgs)	Declaration of Yvonne Niami In Opposition To Sale Motion.
7	03/16/2022	205 (17 pgs)	Reply to (related document(s): 142 Motion to Sell Property of the Estate Free and Clear of Liens under Section 363(f) Debtor's Motion For An Order: (1) Approving The Sale Of The Debtors Real Property Free And Clear Of All Liens, Claims, Encumbrances, And Interests, With The Exce filed by Debtor Crestlloyd, LLC) Richard Saghians Omnibus Reply In Support Of Debtors Sale Motion with proof of service Filed by Interested Party Richard Saghian (Weiner, Genevieve) (Entered: 03/16/2022)
8	03/16/2022	206 (11 pgs)	Declaration re: Declaration Of Richard Saghian In Support Of Richard Saghians Omnibus Reply In Support Of Debtors Sale Motion with proof of service Filed by Interested Party Richard Saghian (RE: related document(s) 205 Reply). (Attachments: # 1 Exhibit # 2 Exhibit 2) (Weiner, Genevieve) (Entered: 03/16/2022)

1 Date Filed	2 Docket No.	3 Description
2 03/16/2022	3 208 (35 pgs)	4 Debtor's Omnibus Reply to Oppositions to Motion For An 5 Order: (1) Approving The Sale Of The Debtors Real Property 6 Free And Clear Of All Liens, Claims, Encumbrances, And 7 Interests, With The Exception Of Enumerated Exclusions; (2) 8 Finding That The Buyer Is A Good Faith Purchaser; (3) 9 Authorizing And Approving The Payment Of Certain Claims 10 From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period 11 Set Forth In Bankruptcy Rule 6004(h); And (5) Providing 12 Related Relief; Memorandum Of Points And Authorities In 13 Support Thereof
8 03/17/2022	9 214 (108 pgs)	10 Notice Of Errata To Declaration Of Joseph Englanoff In Support 11 Of Objection Of Yogi Securities Holdings, LLC To Debtors 12 Motion To Approve The Sale Of The Debtors Real Property
10 03/17/2022	11 215 (100 pgs)	12 Request for judicial notice In Support Of Opposition Of Nile 13 Niami To Debtors Motion For An Order Approving The Sale Of 14 The Debtor's Real Property Free And Clear Of All Liens, Claims, 15 Encumbrances, And Interests, With The Exception Of 16 Enumerated Exclusions Filed by Interested Party Nile Niami 17 (RE: related document(s)196 Objection). (Rafatjoo, Hamid) 18 (Entered: 03/17/2022)
15 3/18/2022	16 217 (8 pgs)	17 Notice - Notice of Lodging of Signed Addendum to Purchase 18 Agreement - Filed by Debtor Crestlloyd, LLC (RE: related 19 document(s)142 Motion to Sell Property of the Estate Free and 20 Clear of Liens under Section 363(f) Debtor's Motion For An 21 Order: (1) Approving The Sale Of The Debtors Real Property 22 Free And Clear Of All Liens, Claims, Encumbrances, And 23 Interests, With The Exception Of Enumerated Exclusions; (2) 24 Finding That The Buyer Is A Good Faith Purchaser; (3) 25 Authorizing And Approving The Payment Of Certain Claims 26 From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period 27 Set Forth In Bankruptcy Rule 6004(h); And (5) Providing 28 Related Relief; Memorandum Of Points And Authorities And Declarations In Support Thereof. Fee Amount \$188, Filed by Debtor Crestlloyd, LLC). (Arnold, Todd) (Entered: 03/18/2022)
24 03/28/2022	25 247 (31 pgs)	26 Order Granting Debtor's Motion For An Order: (1) Approving 27 The Sale Of The Debtor's Real Property Free And Clear Of All 28 Liens, Claims Encumbrances, And Interests, With The Exception Of Enumerated Exclusions; (2) Finding That The Buyer Is A Good Faith Purchaser; (3) Authorizing And Approving The Payment Of Certain Claims From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period Set Forth In Bankruptcy Rule 6004(h); and (5) Providing Related Relief

<b>Date Filed</b>	<b>Docket No.</b>	<b>Description</b>
3/21/2022	251	Transcript of Hearing Held March 21, 2022 – continued hearing re Debtor's Motion For An Order: (1) Approving The Sale Of The Debtors Real Property Free And Clear Of All Liens, Claims, Encumbrances, And Interests, With The Exception Of Enumerated Exclusions; (2) Finding That The Buyer Is A Good Faith Purchaser; (3) Authorizing And Approving The Payment Of Certain Claims From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period Set Forth In Bankruptcy Rule 6004(h); And (5) Providing Related Relief
3/30/2022	263	Transcript of Hearing Held March 18, 2022 – Debtor's Motion For An Order: (1) Approving The Sale Of The Debtors Real Property Free And Clear Of All Liens, Claims, Encumbrances, And Interests, With The Exception Of Enumerated Exclusions; (2) Finding That The Buyer Is A Good Faith Purchaser; (3) Authorizing And Approving The Payment Of Certain Claims From Sale Proceeds; (4) Waiving The Fourteen-Day Stay Period Set Forth In Bankruptcy Rule 6004(h); And (5) Providing Related Relief

Dated: April 27, 2022

LEVENE, NEALE, BENDER, YOO  
& GOLUBCHIK L.L.P.

By: /s/ Todd M. Arnold  
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